

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.</p>	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
<p>In re: BERNARD L. MADOFF, Debtor.</p>	

<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. ANNE SQUADRON, ANNE STRICKLAND SQUADRON, SETH SQUADRON, ELIZABETH SQUADRON, DANIEL SQUADRON, WILLIAM SQUADRON, DEBRA LAGAPA, RICHARD SQUADRON, THEODOSIA PRICE, DIANE SQUADRON, THOMAS SHEA, PETER GOLD, CAROL GOLD, SARAH D. GOLD, SWING HARRE, DAVID HARRE, VANESSA N. GANG, ANNA ROTHWELL, ROBERT VAS DIAS and MARGARET BUTCHER, Defendants.</p>	Adv. Pro. No. 10-05164 (SMB)
--	------------------------------

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including March 2, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York
January 28, 2015

By: /s/ Howard L. Simon
Howard L. Simon (hsimon@windelsmarx.com)
Kim M. Longo (klongo@windelsmarx.com)
John J. Tepedino (jtepedino@windelsmarx.com)
Windels Marx Lane & Mittendorf LLP
156 West 56th Street
New York, New York 10019
Tel: (212) 237-1000
Fax: (212) 262-1215

*Special Counsel to Irving H. Picard, Trustee for
the SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

Dated: New York, New York
January 28, 2015

By: /s/ Gabrielle J. Pretto
Barry R. Lax (blax@laxneville.com)
Brian J. Neville (bnevile@laxneville.com)
Gabrielle J. Pretto (gpretto@laxneville.com)
Lax & Neville, LLP
1450 Broadway, 35th Floor
New York, New York 10018
Telephone: (212) 696-1999
Facsimile: (212) 566-4531

Attorneys for Defendants